

1 Christopher B. Ghio (State Bar No. 259094)  
2 Christopher Celentino (State Bar No. 131688)  
3 Jeremy B. Freedman (State Bar No. 308752)  
**DINSMORE & SHOHL LLP**  
4 655 West Broadway, Suite 800  
5 San Diego, CA 92101  
6 Telephone: 619.400.0500  
7 Facsimile: 619.400.0501  
[christopher.ghio@dinsmore.com](mailto:christopher.ghio@dinsmore.com)  
[christopher.celentino@dinsmore.com](mailto:christopher.celentino@dinsmore.com)  
[jeremy.freedman@dinsmore.com](mailto:jeremy.freedman@dinsmore.com)

8  
9  
10 Special Counsel to Richard A. Marshack  
11  
12

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re:  
THE LITIGATION PRACTICE GROUP P.C.,  
Debtor.

Case No.: 8:23-bk-10571-SC

Chapter 11

**DECLARATION OF EEYAH TAN IN  
SUPPORT OF SALE MOTION AND  
RELATED BRIEFS**

Date: July 21, 2023  
Time: 10:00 a.m.  
Judge: Hon. Scott C. Clarkson  
Place: Courtroom 5C  
411 W. Fourth Street  
Santa Ana, CA 92701

## DECLARATION OF EYAH TAN

I, Eeyah Tan, declare as follows:

1. I am the Director of Operations of Phoenix Law, PC.

2. Phoenix Law or The Litigation Practice Group P.C. ("LPG") is a debt resolution law firm not a debt settlement company or a credit repair company.

3. Phoenix Law/LPG has hundreds of success stories wherein it achieves favorable results including case dismissals for clients.

4. Phoenix Law/LPG plays a vital role in assisting consumers facing financial challenges through the 107 employees it currently employs.

10        5. According to our data, 36% of active clients are in litigation or have completed some  
11 form of litigation.

12        6.      We at Phoenix Law/LPG assist consumers in resolving their debts through the  
13 following measures:

14 a. We notify creditors and collectors that the client is represented by our counsel,  
15 and all future communications must be directed to Phoenix Law. In case of any harassment or  
16 violations of the Fair Debt Collection Practices Act by debt collectors, we take appropriate legal  
17 action on clients' behalf.

18                   b.        We dispute and challenge any documentation provided by the creditors to  
19 ensure compliance with all relevant federal and state laws. To address inaccuracies, we send letters  
20 to the three major credit bureaus, disputing the accuracy of the enrolled accounts.

21 c. We provide comprehensive legal representation in all disputes related to debts,  
22 including but not limited to:

- i. initiating legal actions against creditors when necessary;
- ii. defending any legal actions brought by creditors against the consumers;
- iii. asserting consumer rights against creditor harassment; and
- iv. providing guidance on the appropriateness of filing for bankruptcy.

1       7.     Phoenix Law/LPG acts as an intermediary between clients and creditors. We do not  
2 negotiate pre-litigation. We strive to reduce the overall debt burden, negotiate lower interest rates,  
3 and potentially secure more manageable repayment terms.

4       8.     The purpose of the call center is to handle incoming calls from clients and provide  
5 assistance by answering their queries related to their debts. Additionally, the call center is responsible  
6 for providing monthly updates to enrolled clients regarding the status of their debts. In May 2023,  
7 Phoenix Law completed 71% of calls while experiencing an abandonment rate of 24%. In June 2023,  
8 our completion rate stood at 62% with an abandonment rate of 30% due to 19,000 Oakstone files  
9 being transferred abruptly. Despite being significantly understaffed, the customer service team  
10 completed 16,704 outbound calls in May 2023 and 10,900 in June 2023.

11       I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct.

13       DATED: July 17, 2023



Eeyah Tan

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document entitled (specify):

### DECLARATION OF EEEYAH TAN IN SUPPORT OF SALE MOTION AND RELATED BRIEFS

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 17, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On July 17, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 17, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**JUDGE'S COPY**

The Honorable Scott C. Clarkson  
United States Bankruptcy Court  
Central District of California  
Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 17, 2023  
Date

Caron Burke  
Printed Name

/s/ Caron Burke  
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Eric Bensamochan on behalf of Interested Party Courtesy NEF  
eric@eblawfirm.us, G63723@notify.cincompass.com

Eric Bensamochan on behalf of Interested Party Eric Bensamochan  
eric@eblawfirm.us, G63723@notify.cincompass.com

Ronald K Brown on behalf of Creditor SDCO Tustin Executive Center, Inc.  
ron@rkbrownlaw.com

Christopher Celentino on behalf of Plaintiff Richard A. Marshack  
christopher.celentino@dinsmore.com, caron.burke@dinsmore.com

Christopher Celentino on behalf of Trustee Richard A Marshack (TR)  
christopher.celentino@dinsmore.com, caron.burke@dinsmore.com

Shawn M Christianson on behalf of Interested Party Courtesy NEF  
cmcintire@buchalter.com, schristianson@buchalter.com

Randall Baldwin Clark on behalf of Interested Party Randall Baldwin Clark  
rbc@randallbclark.com

Leslie A Cohen on behalf of Interested Party Courtesy NEF  
leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com

Jenny L Doling on behalf of Interested Party INTERESTED PARTY  
jd@jdl.law, dolingjr92080@notify.bestcase.com;15994@notices.nextchapterbk.com

Daniel A Edelman on behalf of Creditor Carolyn Beech  
dedelman@edcombs.com, courtecl@edcombs.com

Christopher Ghio on behalf of Plaintiff Richard A. Marshack  
christopher.ghio@dinsmore.com, Kristina.Heller@Dinsmore.com

Christopher Ghio on behalf of Trustee Richard A Marshack (TR)  
christopher.ghio@dinsmore.com, Kristina.Heller@Dinsmore.com

Jeffrey I Golden on behalf of Creditor Anaheim Arena Management, LLC  
jgolden@go2.law,  
kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wglp.com;gestrada@wglp.com;golden.jeff  
reyi.b117954@notify.bestcase.com

Jeffrey I Golden on behalf of Creditor Anaheim Ducks Hockey Club, LLC  
jgolden@go2.law,  
kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wglp.com;gestrada@wglp.com;golden.jeff  
reyi.b117954@notify.bestcase.com

Jeffrey I Golden on behalf of Interested Party Courtesy NEF  
jgolden@go2.law,  
kadele@ecf.courtdrive.com;cbmeeker@gmail.com;lbracken@wglp.com;gestrada@wglp.com;golden.jeff  
reyi.b117954@notify.bestcase.com

Richard H Golubow on behalf of Creditor Debt Validation Fund II, LLC  
rgolubow@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

Richard H Golubow on behalf of Creditor MC DVI Fund 1, LLC  
rgolubow@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

Richard H Golubow on behalf of Creditor MC DVI Fund 2, LLC  
rgolubow@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

D Edward Hays on behalf of Interested Party Courtesy NEF  
ehays@marshackhays.com,  
ehays@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com

D Edward Hays on behalf of Trustee Richard A Marshack (TR)  
ehays@marshackhays.com,  
ehays@ecf.courtdrive.com;kfrederick@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoza@ecf.courtdrive.com

Alan Craig Hochheiser on behalf of Creditor City Capital NY  
ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com

Gerrick A Hollander on behalf of Creditor Debt Validation Fund II, LLC  
ghollander@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

Gerrick A Hollander on behalf of Creditor MC DVI Fund 1, LLC  
ghollander@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

Gerrick A Hollander on behalf of Creditor MC DVI Fund 2, LLC  
ghollander@wghlawyers.com, jmartinez@wghlawyers.com;svillegas@wghlawyers.com

Razmig Izakelian on behalf of Creditor OHP-CDR, LP  
razmigizakelian@quinnemanuel.com

Joon M Khang on behalf of Debtor The Litigation Practice Group P.C.  
joon@khanglaw.com

Ira David Kharasch on behalf of Interested Party Ad Hoc Consumer Claimants Committee  
ikharasch@pszjlaw.com

Ira David Kharasch on behalf of Interested Party Courtesy NEF  
ikharasch@pszjlaw.com

Nicholas A Koffroth on behalf of Creditor Committee Committee of Unsecured Creditors  
nkoffroth@foxrothschild.com, khoang@foxrothschild.com

David S Kupetz on behalf of Defendant March Bein, LLC  
David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com

David S Kupetz on behalf of Interested Party Courtesy NEF  
David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com

Christopher J Langley on behalf of Interested Party Courtesy NEF  
chris@slclawoffice.com,  
omar@slclawoffice.com;langleycr75251@notify.bestcase.com;ecf123@casedriver.com

Daniel A Lev on behalf of Interested Party Courtesy NEF

daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com

Michael D Lieberman on behalf of Creditor Phillip A. Greenblatt, PLLC  
mlieberman@lipsonneilson.com

Yosina M Lissebeck on behalf of Trustee Richard A Marshack (TR)  
Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com

Richard A Marshack (TR)  
pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titlexi.com

Laila Masud on behalf of Interested Party Courtesy NEF  
lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Laila Masud on behalf of Interested Party Richard A. Marshack  
lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Laila Masud on behalf of Plaintiff Richard Marshack  
lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Laila Masud on behalf of Trustee Richard A Marshack (TR)  
lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

Kenneth Miskin on behalf of U.S. Trustee United States Trustee (SA)  
Kenneth.M.Miskin@usdoj.gov

Byron Z Moldo on behalf of Interested Party Byron Moldo  
bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com, dperez@ecjlaw.com

Alan I Nahmias on behalf of Interested Party Courtesy NEF  
anahmias@mbn.law, jdale@mbnlawyers.com

Victoria Newmark on behalf of Interested Party Courtesy NEF  
vnewmark@pszjlaw.com

Queenie K Ng on behalf of U.S. Trustee United States Trustee (SA)  
queenie.k.ng@usdoj.gov

Keith C Owens on behalf of Creditor Committee Committee of Unsecured Creditors  
kowens@foxrothschild.com, khoang@foxrothschild.com

Teri T Pham on behalf of Attorney Teri Pham  
tpham@epglawyers.com, ttpassistant@epglawyers.com

Douglas A Plazak on behalf of Defendant Greyson Law Center PC  
dplazak@rhlaw.com

Ronald N Richards on behalf of Defendant Consumer Legal Group, PC  
ron@ronaldrichards.com, 7206828420@filings.docketbird.com

Ronald N Richards on behalf of Interested Party Courtesy NEF  
ron@ronaldrichards.com, 7206828420@filings.docketbird.com

Gregory M Salvato on behalf of Creditor Mari Agape

gsalvato@salvatoboufadel.com,  
calendar@salvatolawoffices.com;jboufadel@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com

Gregory M Salvato on behalf of Interested Party Courtesy NEF  
gsalvato@salvatoboufadel.com,  
calendar@salvatolawoffices.com;jboufadel@salvatoboufadel.com;gsalvato@ecf.inforuptcy.com

Olivia Scott on behalf of Creditor Azzure Capital LLC  
olivia.scott3@bclplaw.com

Olivia Scott on behalf of Creditor Hi Bar Capital LLC  
olivia.scott3@bclplaw.com

Jonathan Serrano on behalf of Plaintiff Richard A. Marshack  
jonathan.serrano@dinsmore.com

Jonathan Serrano on behalf of Trustee Richard A Marshack (TR)  
jonathan.serrano@dinsmore.com

Paul R Shankman on behalf of Attorney Paul R. Shankman  
PShankman@fortislaw.com, info@fortislaw.com

Paul R Shankman on behalf of Creditor United Partnerships, LLC  
PShankman@fortislaw.com, info@fortislaw.com

Leslie Skorheim on behalf of U.S. Trustee United States Trustee (SA)  
leslie.skorheim@usdoj.gov

Howard Steinberg on behalf of Defendant BankUnited, N.A.  
steinbergh@gtlaw.com, pearsallt@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com

Andrew Still on behalf of Interested Party Courtesy NEF  
astill@swlaw.com, kcollins@swlaw.com

United States Trustee (SA)  
ustpregion16.sa.ecf@usdoj.gov

Sharon Z. Weiss on behalf of Creditor Azzure Capital LLC  
sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC\_KM\_ECF\_SMO@bclplaw.com

Sharon Z. Weiss on behalf of Creditor Hi Bar Capital LLC  
sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC\_KM\_ECF\_SMO@bclplaw.com

Johnny White on behalf of Creditor Debt Relief Group, LLC  
JWhite@wrslawyers.com, jlee@wrslawyers.com

Johnny White on behalf of Interested Party Courtesy NEF  
JWhite@wrslawyers.com, jlee@wrslawyers.com